

1 DAVID A. HUBBERT
2 Deputy Assistant Attorney General

3 YAEL BORTNICK
4 Trial Attorney, Tax Division
5 U.S. Department of Justice
6 P.O. Box 683
7 Washington, D.C. 20044
8 202-514-6632 (v)
9 202-307-0054 (f)
Yael.Bortnick@usdoj.gov

10 BRIAN STRETCH
11 United States Attorney
12 *Of Counsel*

13 *Attorneys for Plaintiff*

14
15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 LISA ZAVIEH, individually, as the successor-
22 in-interest to Amir Zavieh, and as the distributee
23 of the Estate of Amir Zavieh, a/k/a Allen Zavieh,

24 Defendants.

25 Case No. 4:17-cv-3286-KAW

26 **STIPULATION AND [PROPOSED]
27 ORDER TO CONTINUE CASE
28 MANAGEMENT CONFERENCE**

29 The United States of America and Lisa Zavieh, by and through undersigned counsel,
30 hereby stipulate and request that the case management conference currently scheduled for
31 January 9, 2018 at 1:30 p.m. be continued to January 23, 2018 at 1:30 p.m. (or as soon thereafter
32 as the Court is available), and state as follows:

1 1. On June 8, 2017, the Court entered an Order Setting Initial Case Management
2 Conference and ADR Deadlines, which set the Initial Case Management Conference for
3 September 5, 2017, at 1:30 p.m. (Docket No. 3).

4 2. On August 29, 2017, the Court continued the Case Management Conference to
5 January 9, 2018 at 1:30 p.m. (Docket No. 11).

6 3. Undersigned counsel for the United States has a four-day trial scheduled to begin
7 on January 8, 2018 in Seattle, Washington, and therefore anticipates being unavailable on
8 January 9, 2018.

9 4. Undersigned counsel for the United States has conferred with undersigned
10 counsel for Ms. Zavieh and Ms. Zavieh agrees to this request.

11 5. This is the parties' first stipulation for a continuance of the case management
12 conference.

13 6. As no scheduling order has yet been entered, this request will not affect the
14 schedule for the case.

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

1 WHEREFORE, the Parties hereby stipulate and request to continue the case management
2 conference to January 23, 2018 at 1:30 p.m. or a date thereafter convenient for the Court.

3 Respectfully submitted this 28th day of November, 2017.

4 DAVID A. HUBBERT
5 Deputy Assistant Attorney General

6 */s/ Yael Bortnick* _____
7 YAEL BORTNICK
8 Trial Attorney, Tax Division
9 U.S. Department of Justice
P.O. Box 683
Washington, D.C. 20044
202-514-6632 (v)
202-307-0054 (f)
Yael.Bortnick@usdoj.gov
11 *Attorneys for the United States*

12 BRIAN STRETCH
13 United States Attorney
14 *Of Counsel*

15 SIDEMAN & BANCROFT LLP

16 */s/ Jay R. Weill* _____
17 JAY R. WEILL
18 *Attorneys for Lisa Zavieh*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, and for good cause shown, IT IS HEREBY ORDERED that the case management conference is continued to January 23, 2018 at 1:30 p.m. SO ORDERED this 29th day of November, 2017.

Kandis Westmore
HON. KANDIS A. WESTMORE
United States Magistrate Judge